

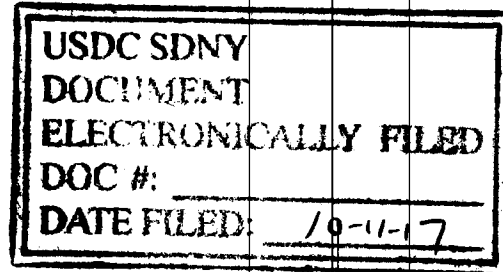


Louis M. Solomon
Tel 212.801.6500
Fax 212.805.5529
lsolomon@gtlaw.com

MEMO ENDORSE

October 11, 2017

Honorable John F. Keenan
United States District Court
Southern District of New York
500 Pearl Street, Room 1930
New York, New York 10007-1312



Re: *BSGR v. Soros, et al.*, Civil Action No. 1:17-cv-02726

Dear Judge Keenan:

We are counsel for Plaintiffs in the above-referenced action. We write to request that the oral argument on Defendants' motion to dismiss the amended complaint, currently scheduled for Wednesday, October 18, be moved two days to October 20, or, if the Court is not available to hear argument on a Friday, to the next available argument date after October 26, due to the fact that I am on trial in New Jersey. We have contacted the Court and have been informed that the Court does not generally hear oral argument on Fridays, and the Court's next available dates for oral argument are November 7-9, 2017. We would therefore request that, unless the Court is willing to make an exception and hear oral argument on October 20, the argument be moved to November 7.

By email dated September 29, 2017, and by telephone on October 10, 2017, we sought Defendants' consent to this application due to my scheduling conflict (set forth in more detail below). Defendants advised us that they do not consent to either October 20 or to any November date. They stated that they did not want to "have a situation where there is another extended delay to accommodate your schedule." (As noted below, we had not sought to delay but to accelerate the prior argument date.)

We originally wrote to the Court on July 28, 2017, requesting that the oral argument, then scheduled for Tuesday, September 26, 2017, be accelerated to September 15, or moved three days to September 29. The Court re-scheduled the argument for October 18, 2017.

The reason for both the prior and instant requests is that I am lead trial counsel in the case, *Huff v. Virgin Media*, before Hon. Frank J. DeAngelis, J.S.C., Superior Court of New Jersey, Morris County, W169-002. The Judge is sitting with the jury Monday-Thursday. I must be in court on those days, and the Court will not delay trial, which is underway. The parties and the Judge currently estimate that the trial will last until October 26.

October 11, 2017

Page 2

I am also lead counsel for the Plaintiffs in this case and am planning to argue in opposition to the motion to dismiss. Moving the argument in this case would permit me to argue the motion here and keep to the trial schedule in the New Jersey action.

Accordingly, we respectfully request that oral argument on Defendants' motion to dismiss the Amended Complaint be rescheduled to November 7, 2017, if it cannot be rescheduled for a Friday.

Thank you for your consideration of this matter.

Respectfully,



Louis M. Solomon

cc: Counsel of Record

Plaintiffs' request to reschedule the oral argument on Defendants' motion to dismiss is GRANTED and oral argument is rescheduled to November 7, 2017 at 11:30 A.M. in Courtroom 20C. No further requests for adjournment of the oral argument on Defendants' motion to dismiss will be granted.

SO ORDERED.

Dated: New York, New York
October 11, 2017



John F. Keenan
United States District Judge